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Attorneys for Western Electricity  
Coordinating Council

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

**PG&E CORPORATION,**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

Bankruptcy Case No. 19-30088 (DM)

Chapter 11  
(Lead Case) (Jointly Administered)

**WESTERN ELECTRICITY  
COORDINATING COUNCIL'S REQUEST  
TO FILE AMENDED PROOFS OF CLAIM  
UNDER SEAL PURSUANT TO ORDER  
GRANTING MOTION OF WESTERN  
ELECTRICITY COORDINATING  
COUNCIL TO FILE PROOFS OF CLAIM  
AND ANY AMENDMENTS THERETO  
UNDER SEAL [Order at Docket No. 4238]**

- ☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

[No Hearing Requested]

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM)*

On October 10, 2019, Western Electricity Coordinating Council ("WECC") filed its *Motion to File Proofs of Claim and Any Amendments Thereto Under Seal* (the "Sealing Motion") [Docket No. 4187]. Thereafter, the Court entered its *Order Granting Motion of Western Electricity*

1 *Coordinating Council to File Proofs of Claim and Any Amendments Thereto Under Seal* on  
2 October 16, 2019 (the “Sealing Order”) [Docket No. 4238]. The sealed proofs of claim subject to  
3 the Sealing Order were entered on the Court’s docket (“Sealed POCs”) [Docket No. 4190], and  
4 WECC filed its *Notice of First Proof of Claim of Western Electricity Coordinating Council Filed*  
5 *Under Seal* and *Notice of Second Proof of Claim of Western Electricity Coordinating Council Filed*  
6 *Under Seal* (collectively the “Notices of Sealed Claims”) with the claims agent, Prime Clerk, on  
7 October 21, 2019. Prime Clerk assigned the two Notices of Sealed Claims as claim numbers 86516  
8 and 82607, respectively, and reflected the Notices of Sealed Claims on the claims register and on  
9 Prime Clerk’s claims docket website.

10 The Sealing Order contemplated the possibility that the Sealed POCs might need to be  
11 amended by WECC. WECC now seeks to amend both Sealed POC’s in order to further clarify its  
12 claims.

13 Based upon the foregoing, WECC requests that the Court enter an Order approving the filing  
14 under seal of WECC’s amendments to the Sealed POCs pursuant to the terms and conditions set  
15 forth in the Sealing Motion and Sealing Order.

16  
17 DATED: July 3, 2020

ZOLKIN TALERICO LLP

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19 By: /s/ Derrick Talerico

Derrick Talerico

20 David B. Zolkin

21 Attorneys for Western Electricity Coordinating Council  
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